

Message

---

**From:** Wright, DavidA [Wright.DavidA@epa.gov]  
**Sent:** 12/3/2019 1:40:47 PM  
**To:** Snyder, Jim [Snyder.Jim@epa.gov]  
**CC:** Anderson, Tom [Anderson.Tom@epa.gov]; Ball, Joel [ball.joel@epa.gov]; Cullen, Daniel [Cullen.Daniel@epa.gov]; Dalton, Joel [Dalton.Joel@epa.gov]; Kimball, Joshua [kimball.joshua@epa.gov]; Kochunas, Kathryn [kochunas.kathryn@epa.gov]; Ott, William [ott.william@epa.gov]; Rojeck, Tristin [rojeck.tristin@epa.gov]; Snyder, Jim [Snyder.Jim@epa.gov]; Wehrly, Linc [wehrly.linc@epa.gov]  
**Subject:** Latest updated certification responsibilities spreadsheet - Jim asked for a copy, includes newer manufacturers  
**Attachments:** Internal EPA Use Only LDV Cert Engineer Resp 3 Dec 2019.xlsx

Let me know if you have any questions, or, if you identify any mistakes with your assigned manufacturers.

Thanks,

David

Message

---

**From:** Wright, DavidA [Wright.DavidA@epa.gov]  
**Sent:** 11/14/2018 8:29:14 PM  
**To:** Anderson, Tom [Anderson.Tom@epa.gov]; Ball, Joel [ball.joel@epa.gov]; Cullen, Daniel [Cullen.Daniel@epa.gov]; Dalton, Joel [Dalton.Joel@epa.gov]; Good, David [good.david@epa.gov]; Kochunas, Kathryn [kochunas.kathryn@epa.gov]; Ott, William [ott.william@epa.gov]; Pugliese, Holly [pugliese.holly@epa.gov]; Rojeck, Tristin [rojeck.tristin@epa.gov]; Snyder, Jim [Snyder.Jim@epa.gov]; Wehrly, Linc [wehrly.linc@epa.gov]  
**Subject:** INTERNAL USE ONLY EPA LDVC Manufacturer Contacts  
**Attachments:** Internal EPA Use Only LDV Cert Engineer Resp 14 Nov 18.xlsx

Attached is the latest updated list of manufacturer contacts primary and backup. This list contains assignments for manufacturers that have not applied for certification in a number of years, and, it also includes manufacturers that have expressed interest in getting certifications for the first time. Do not share this list outside the Agency as not all of the manufacturers may want to be identified as having contacted EPA.

Also, per there request **Ex. 4 CBI** has been added to the list and Jim S. is their primary contact.

Thanks,

David

Message

---

**From:** Ott, William [ott.william@epa.gov]  
**Sent:** 2/13/2020 1:43:00 PM  
**To:** Wehrly, Linc [wehrly.linc@epa.gov]; Wright, DavidA [Wright.DavidA@epa.gov]; Ball, Joel [ball.joel@epa.gov]; Cullen, Daniel [Cullen.Daniel@epa.gov]; Snyder, Jim [Snyder.Jim@epa.gov]; Dalton, Joel [Dalton.Joel@epa.gov]; Rojeck, Tristin [rojeck.tristin@epa.gov]; Kochunas, Kathryn [kochunas.kathryn@epa.gov]; Fernandez, Antonio [fernandez.antonio@epa.gov]; Good, David [good.david@epa.gov]  
**Subject:** Volvo CPM Meeting Materials  
**Attachments:** CBI\_MVVX\_CORRESP\_LTR01CPP.pdf; Volvo Conducted Coast Down Self Audit Program.pdf

Attached are the materials for today's meeting with Volvo.



# **VOLVO PRE-CERT 2021MY**

**ACCORDING TO CD-18-10**

## **EPA**



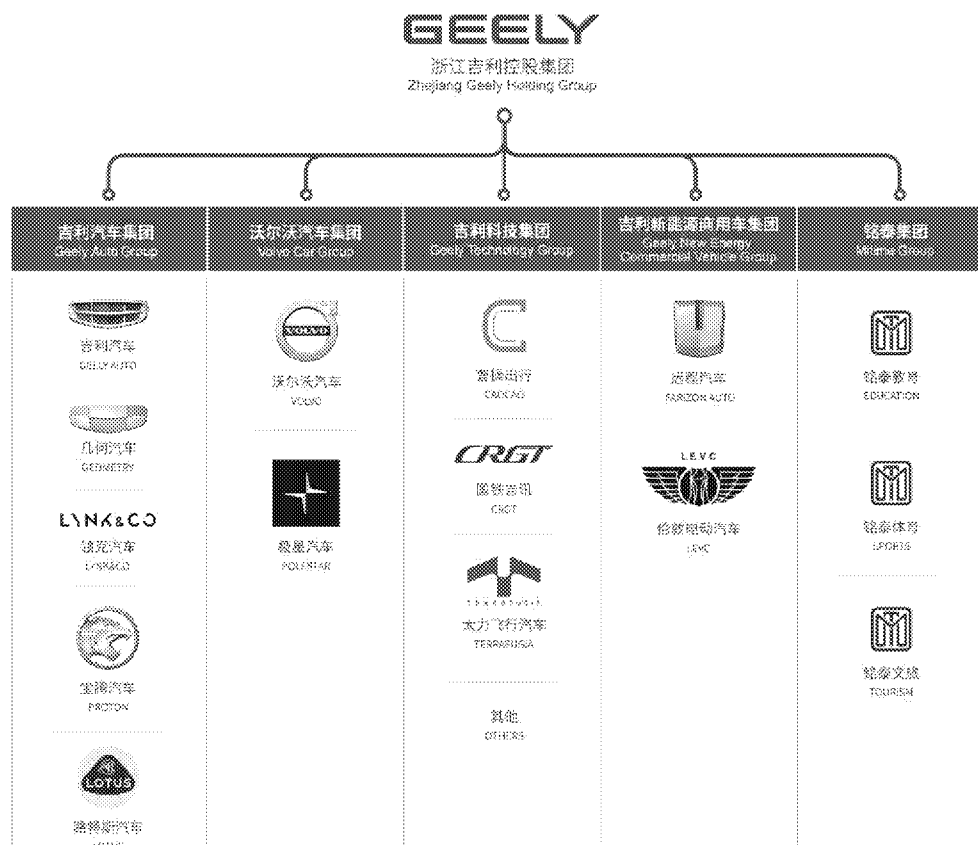
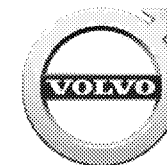
Portions of the attached presentation are confidential business information. The slides consisting of such confidential business information are indicated with a red notation.

# 1.1 VOLVO CONTACT PERSONS



Name	Mailing Address	Phone number	E-mail address	Responsibility
Dan Doku	Volvo Car USA, LLC	1-201-621-2502	dan.doku@volvocars.com	Manager, Emission Compliance
	Quality & Customer Satisfaction			IUVP
	315 Sigma Drive, Summerville, SC 29486			OBD
Nitin Rana	Volvo Car USA, LLC	1-843-934-6545	nitin.rana@volvocars.com	Emission Engineer, Certification & Compliance
	Quality & Customer Satisfaction			
	315 Sigma Drive, Summerville, SC 29486			
Jan Knutsson	Volvo Car Corporation	+46 76 6210317	jan.knutsson@volvocars.com	Manager Emission Certification
	Dept. 58810, PV2B			& Compliance, VCC
	405 31 Gothenburg, SWEDEN			
Per-Anders Lennvi	Volvo Car Corporation	+46 76 6210927	per-anders.lennvi@volvocars.com	Senior Compliance Expert
	Dept. 58810, PV3A1			Emission Compliance & FE
	405 31 Gothenburg, SWEDEN			Evap Durability Procedure
Mats Evertsson	Volvo Car Corporation	+46 76 6210997	mats.evertsson@volvocars.com	Senior Compliance Expert
	Dept. 58810, PV3A1			Emission Compliance & FE
	405 31 Gothenburg, SWEDEN			IUVP
Christian Andersson	Volvo Car Corporation	+46 76 6210925	christian.l.andersson@volvocars.com	Senior Compliance Expert
	Dept. 58810, PV3A1			Emission Compliance & FE
	405 31 Gothenburg, SWEDEN			IUVP
Marie Weberberger	Volvo Car Corporation	+46 73 9245737	marie.weberberger@volvocars.com	Compliance Expert
	Dept. 58810, PV3A1			Emission Compliance & FE
	405 31 Gothenburg, SWEDEN			IUVP
Xuxin He	Volvo Car Corporation	+46 72 9775173	xuxin.he@volvocars.com	Compliance Expert
	Dept. 58810, PV3A1			Emission Compliance & FE
	405 31 Gothenburg, SWEDEN			IUVP

# 1.1 VOLVO / GEELY / LOTUS OWNERS STRUCUTRE

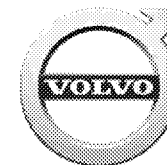


# Ex. 4 CBI

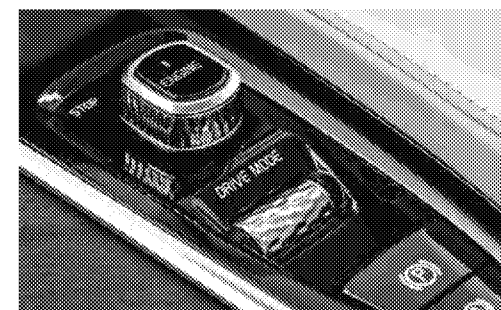
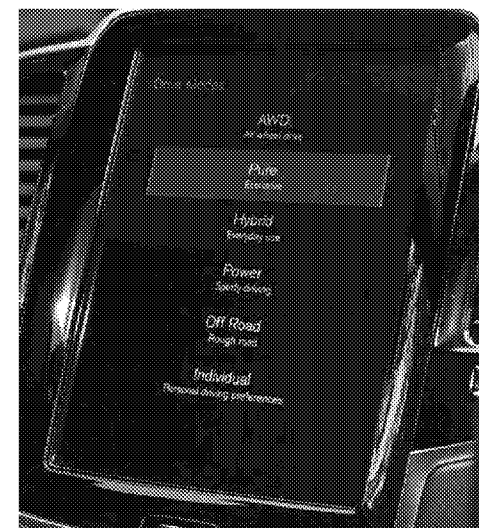
# Ex. 4 CBI

# Ex. 4 CBI

# 2.1 RECALIBRATION OF "PURE" DRIVE MODE FOR PHEV



- For 2021MY Volvo will recalibrate "Pure" mode.
  - It means that in "Pure" mode, ICE will only start if accelerator pedal is pressed to Kick-down.
  - "Pure" mode is not default and is not used for Fuel Economy testing. (FE testing performed in Hybrid mode)
    - For MY22 Volvo is considering having memory for Pure mode in addition to Hybrid mode. This will create two default modes. EPA comments?



## 2.2 NEW LDT CLASSIFIED VEHICLES OF 2021MY

---



- No new LDT's for 2021MY.

# Ex. 4 CBI

# Ex. 4 CBI

# **Ex. 4 CBI**

# Ex. 4 CBI

# **Ex. 4 CBI**

# Ex. 4 CBI

# **Ex. 4 CBI**

# **Ex. 4 CBI**

# **Ex. 4 CBI**

# Ex. 4 CBI

# Ex. 4 CBI

## 3.5.9 TIER3 LBT COMPLIANCE

---



- Volvo is aware of the requirements outlined in 86.1844-01(d)(11)(iii) and 86.1811-17(d). LBT method of compliance have been included into the Part1 application since 2015MY.
- LBT information for 2021MY was also submitted to EPA & CARB in December 2019. Status?

# Ex. 4 CBI

# Ex. 4 CBI

# Ex. 4 CBI

# Ex. 4 CBI

# Ex. 4 CBI

# Ex. 4 CBI

# Ex. 4 CBI

# Ex. 4 CBI

# Ex. 4 CBI

# Ex. 4 CBI

# Ex. 4 CBI

# Ex. 4 CBI

# Ex. 4 CBI

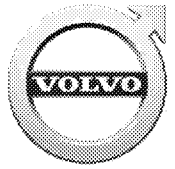
# Ex. 4 CBI

# **Ex. 4 CBI**

# Ex. 4 CBI

## 3.8 ORVR SAFETY

---

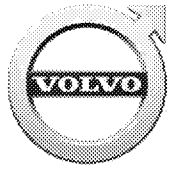


- No changes of ORVR system in 2021MY.
- 100% Carry-over:
  - Volvo follow the application requirements in Attachment A of CCD-05-03, carryover from a previously certified Evaporative / ORVR Family by an OEM.

# **Ex. 4 CBI**

## 3.10 LAB EQUIPMENT OVERVIEW

---



- No significant changes since last year.
- Nothing new for 2021MY.
- First Model Year for BEV Certification in US. Similar Lab equipment as for current Plug-in Hybrids (Certified for US since 2016MY)

## 4.1.1 EV LABELS

---



EV Labels for 2021MY :

- Volvo will use SAE J1634 Multi-Cycle Test (MCT) procedure to determine range and energy consumption for BEV.
- Volvo will use EPA's calculation template (2019 generic EV Label calculator) for the determination of label values.

## 4.1.2 PHEV LABEL

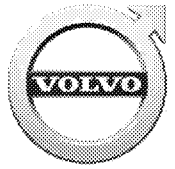
---



- Volvo use the EPA PHEV calculator.

## 4.2 CAFE ISSUES

---



- Lotus included in CAFE reports since final 2018MY report.
  - 2018 Final MY report
  - 2019 Mid MY report
  - 2020 Pre MY report
- Comments about submitted and/or future reports?

# **Ex. 4 CBI**

# Ex. 4 CBI

## 4.3 HEAVY DUTY VEHICLES

---



- Not applicable for Volvo in 2021MY.

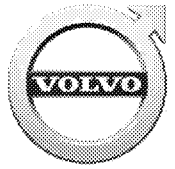
# Ex. 4 CBI

# **Ex. 4 CBI**

# Ex. 4 CBI

# **Ex. 4 CBI**

# 6.1-1 IUVP OVERVIEW



- 6.1 Provide an overview of the in-use verification program (IUVP) testing and any in-use confirmatory program (IUCP) testing conducted in the past year, including the total number of low mileage and high mileage IUVP/IUCP vehicles tested in the past year. Please discuss your remedy or testing plans for vehicles which qualified for IUCP testing in the past year but have not yet started IUCP testing.

**2014MY IUVP**: 14 vehicles tested (13 pass)

**2018MY IUVP**: 6 vehicles tested (5 pass)

**2015MY IUCP**: 5 vehicles tested (all pass)  
[CARB request]

**2012MY IUVP**: Ongoing (all pass so far)

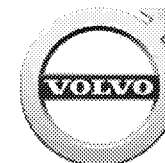
**2013MY IUVP**: Ongoing  
[CARB requested to add extra tests]

**See attached IUVP end-of-year report.  
(Dated Dec 20)**



Adobe Acrobat  
Document

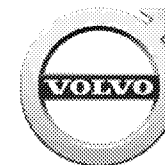
# 6.1.1-2 IUVP (CONTINUED)



- 6.1.1 Are any of your low and high mileage IUVP test programs in danger of not meeting the required completion dates (one year and five years after production ended, respectively), ref 40 CFR 1845-04(b)(4) and (c)(4)? If so, please explain. **No.**
- 6.1.2 If any vehicle exceeded the in-use emission standard for any constituent (including GHG emissions), please provide a summary or a graph of all the IUVP/IUCP testing conducted for that test group or evaporative family.
- 2014MY: 1 fail out of 14 vehicles (HWY CREE & NOx)**
- 2018MY: 1 fail out of 6 vehicles (2 Day)**

Model Year	Model	VIN	Test Group	EVAP Family	Tests Performed	Tests Passed/Void	Notes
2018	590	LYV981MK2IP021697	JVXK02.0125	JVXK0142EV5	FTP, HW, US06, 2-DAY, ORVR	FTP, HW, US06, ORVR	
2018	560	LYV402TM9JB156294	JVXK02.0125	JVXK0130EV2	FTP, HW, US06, 2-DAY, ORVR	FTP, HW, US06, 2-DAY, ORVR	
2018	XC60	LYV102RK5JB077973	JVXK02.0A70	JVXK0142EV5	FTP, HW, US06, 2-DAY, ORVR	FTP, HW, US06, 2-DAY, ORVR	
2018	XC90	YV4102PK011348204	JVXK02.0A70	JVXK0142EV4	FTP, HW, US06, 2-DAY, ORVR	FTP, HW, US06, 2-DAY, ORVR	
2018	XC90	YV4A22PK011201195	JVXK02.0B70	JVXK0142EV4	FTP, HW, US06, 2-DAY, ORVR	FTP, HW, US06, 2-DAY, ORVR	
2018	XC90	YV4A22PK411206500	JVXK02.0B70	JVXK0142EV4	FTP, HW, US06, 2-DAY, ORVR	FTP, HW, US06, 2-DAY, ORVR	
2018	560	LYV402TK0JB157445	JVXK02.0125	JVXK0130EV2	FTP	VOID	
2018		LOW VOLUME EXEMPTION	JVXK02.0030	JVXK0130EV3			
2018		LOW VOLUME EXEMPTION	JVXK02.0160	JVXK0130EV2			
2018		LOW VOLUME EXEMPTION	JVXK02.0P30	JVXK0142EP1			
2018		LOW VOLUME EXEMPTION	JVXK02.0P30	JVXK0142EP1			
2014	560	YV1612F50E2168370	EVXK02.5U3T	EVXK0130ET3	FTP, HW, US06, 2-DAY, ORVR	FTP, HW, US06, 2-DAY, ORVR	
2014	XC90	YV4952CZ2E1667205	EVXK03.2U2N	EVXK0130ET3	FTP, HW, US06, 2-DAY, ORVR	FTP, US06, 2-DAY, ORVR (VOID)	
2014	XC60	YV4952DZ8E2532021	EVXK03.2U2N	EVXK0130EB6	FTP, HW, US06, 2-DAY, ORVR	FTP, HW, US06, 2-DAY, ORVR	
2014	XC60	YV4952DZ7E2505085	EVXK03.2U2N	EVXK0130EB6	FTP, HW, US06, 2-DAY, ORVR	FTP, HW, US06, 2-DAY, ORVR	
2014	560	YV1612F50E2294801	EVXK02.5U3T	EVXK0130ET3	FTP, HW, US06	FTP, HW, US06	
2014	560	YV1612F51E2279864	EVXK02.5U3T	EVXK0130ET3	FTP, HW, US06	FTP, HW, US06	
2014	560	YV1612F50E2290501	EVXK02.5U3T	EVXK0130ET3	FTP, HW, US06	FTP, HW, US06	
2014	560	YV1612FH5E2271991	EVXK02.5U3T	EVXK0130ET3	FTP	FTP	
2014	560	YV1902FH0E2295051	EVXK03.0U2T	EVXK0130ET3	FTP	FTP	
2014	XC90	YV4952CZ8E1699052	EVXK03.2U2N	EVXK0130ET3	FTP	FTP	
2014	560	YV1902FH6E2197703	EVXK03.0U2T	EVXK0130EB6	FTP, HW, US06	FTP, HW, US06	
2014	XC70	YV4902BZ2E1189059	EVXK03.0U2T	EVXK0130EB6	FTP, HW, US06	FTP, HW, US06	
2014	XC60	YV4902DZ8E2545514	EVXK03.0U2T	EVXK0130EB6	FTP, HW, US06	FTP, HW, US06	
2014	XC60	YV4952DZ0E2514724	EVXK03.2U2N	EVXK0130EB6	FTP, HW, US06	FTP, HW, US06	
2014		LOW VOLUME EXEMPTION	EVXK03.252N	EVXK0141ZEP			
2014		LOW VOLUME EXEMPTION	EVXK03.252N	EVXK0130EB6			
2015	560	YV140MFK1F1347302	FVXK02.0U3T	FVXK0130EV3	FTP, HW, US06	FTP, HW, US06	
2015	560	YV140MFK1F2554002	FVXK02.0U3T	FVXK0130EV3	FTP, US06	FTP, US06	
2015	560	YV140MFK2F1344329	FVXK02.0U3T	FVXK0130EV3	FTP, US06	FTP, US06	
2015	560	YV140MFK1F1357132	FVXK02.0U3T	FVXK0130EV3	FTP, US06	FTP VOIDED, US06 VOIDED	
2015	560	YV140MFK1F1357132	FVXK02.0U3T	FVXK0130EV3	FTP, US06	FTP, US06	
2015	560	YV140MFK2F1540177	FVXK02.0U3T	FVXK0130EV3	FTP, US06	FTP, US06	
2013	XC90	YV4952CY4D1668709	OVXK03.2U2N	OVXK0130ET3	FTP, HW, US06	Pending	
2013	XC90	YV167MKD1310108	OVXK02.5U2T	OVXK0132EV2	FTP, HW, US06, 2-DAY, ORVR	Pending	
2012	XC70	YV4902BZ7C1129220	OVXK03.0U2T	OVXK0130EB6	FTP, HW, US06, 2-DAY, ORVR	FTP, HW, US06, 2-DAY, ORVR	
2012	PENDING					Pending	
2012	PENDING					Pending	

# 6.1.3-4 IUVP (CONTINUED)



- 6.1.3 Provide information concerning your upcoming IUVP programs, e.g. in the 2020 model year compliance program meeting, manufacturers would provide information for the 2020 calendar year IUVP programs (that cover 2015 model year high mileage vehicles and 2019 model year low mileage vehicles).
  - Volvo will be testing model year 2019 low miles vehicles and 2015 high mileage vehicles. Please note one of the test groups, test group/evaporative family: FVVXV02.0U3T/FVVXR0130EV3 underwent IUVP testing in calendar year 2019.
- 6.1.4 Provide a list of small volume test groups which will use small volume sampling for the IUVP program which will be conducted in the upcoming calendar year.

2019MY Sales as of  
Dec 2019:  
107822 vehicles

Suggested Low  
Volume Exempt:  
KVVXJ02.0P30  
KVVXV02.0U7B  
In total 6096 vehicles

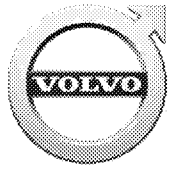


Adobe Acrobat  
Document

Sales:	Total US	(Incl. "177 States")	Calif
<b>Test Group: KVVXJ02.0P30 (LEV III SULEV 30 / Tier 3 bin 30)</b>			
Durability Group KVVXJHGVHLV1			
Model			
XC60 T6 AWD PHEV (LDT)	1235	725	488
XC60 T6 AWD PHEV (LDT)	2162	1287	674
S90 T6 AWD PHEV (LDV)	170	77	38
S90 T6 AWD PHEV (LDV)	422	381	37
Total in Test Group:	3889	2460	1245
<b>Test Group: KVVXJ02.0U7A (LEV III SULEV 30 / Tier 3 bin 70)</b>			
Durability Group KVVXJGPHNN01			
Model			
XC90 T6 (LDT3)	2095	120	84
XC90 T6 AWD (LDT3)	3592	2081	995
S90 T6 (LDV)	575	112	35
V80 T6 (LDV)	335	19	5
S90 T6 AWD (LDV)	385	119	17
V80CC T6 AWD (LDT2)	272	58	4
XC90 T6 (LDV)	6454	1527	881
XC90 T6 AWD (LDT2)	12546	8831	802
S90 T6 (LDV)	5623	2288	824
V80 T6 (LDV)	52	48	16
V80CC T6 AWD (LDT2)	5	3	0
Total in Test Group:	31322	12841	2866
<b>Test Group: KVVXJ02.0530 (LEV III SULEV 30 / Tier 3 bin 30)</b>			
Durability Group KVVXJGPHNN02			
Model			
XC90 T6 AWD (LDT2)	11585	5985	925
XC90 T6 AWD (LDT3)	28883	12575	3466
S90 T6 AWD (LDV)	688	336	46
V80 T6 AWD (LDV)	182	93	24
V80CC T6 AWD (LDT2)	278	117	21
S90 T6 AWD (LDV)	8882	5532	350
V80 T6 AWD (LDV)	272	234	22
Total in Test Group:	50509	24918	4786
<b>Test Group: KVVXJ02.0U70 (LEV III SULEV 30 / Tier 3 bin 70)</b>			
Durability Group KVVXJGPHNN01			
Model			
XC60 T6 AWD (LDT2)	15585	11119	2020
Total in Test Group:	15585	11119	2020
<b>Test Group: KVVXV02.0U7B (LEV III SULEV 30 / Tier 3 bin 70)</b>			
Durability Group KVVXJGPHNN01			
Model			
XC40 T4 (LDV)	2107	855	292
Total in Test Group:	2107	855	292
Total Projected Sales (as of Dec 2019)	107822	54863	11182

## 6.2 IUVP RESPONSIBILITY AND TIMING

---



- 6.2 Describe who is responsible for submitting these reports to EPA and their time line for doing so  
**Daniel Doku. Periodically through the test year as needed and when tests are available.**

# 6.3-6.4 #1 ERC FAILURES, DEFECTS & RECALLS



*Same information as presented last year (still valid)*

- 6.3 Explain the methods used to track emission related component failures that occur in the field. Describe the method you use to determine that an in-use emissions related defect exists.

*Describe how you ensure that EPA is notified of a defect within fifteen (15) working days after an emission component has twenty-five (25) defects for the same model year vehicle(s) and/or engines(s).*

**The CCAP (Critical Concern Action Process.) process can be offered within a courtesy visit in the future if requested as we have done with other authorities before.**

## **1. Tracking of emission related component failures**

Volvo Cars track Emission Related component (ERC) through a special code in our computer systems to highlight them. From the Early Warning System (EWS) and warranty data, sales company (NSC) keep track of the ERC components and the potential failure levels.

Weekly meetings between Volvo Cars and NSC keeps track of components that are increasing in the reporting. Components with increasing failure levels are addressed to the Current Model Quality team at Volvo Cars who starts the investigation. If any component reach the reporting level, they are addressed into the Critical Concern Action Process.

## **2. Volvo Cars Critical Concern Action Process – How to handle potentially critical concerns**

All potentially critical concern are handling within Volvo Cars Critical Concern Action Process (CCAP). CCAP has been Volvo Cars standardized process for critical concerns over ten years and its has been continuously improved since then.

Potential Critical Product Concerns managed by the Critical Concern Management Team (CCMT) are defined in the 4 areas below and valid for vehicles after Factory complete (FC):

### **Product Safety Concerns**

Any product condition that may potentially result in hazards in vehicle operation, or other hazardous vehicle characteristics, that may require correction in the field.

# 6.3-6.4 #2 ERC FAILURES, DEFECTS & RECALLS



*Same information as presented last year (still valid)*

## **Product Legal or Compliance Concerns**

Any product discrepancies that may involve potential failure to meet a safety or environmental regulation applicable in the country of sale.

## **Product Environmental Concerns**

Concerns that may result in undesirable vehicle characteristics and which may require correction. Product Environmental Concerns could be of the following: exhaust or evaporative emissions, on-board diagnostic system, hazardous materials, noise, fuel economy, electromagnetic compatibility, weights, engine power, and smoke.

## **Customer Satisfaction Concerns**

Any product discrepancy other than a Critical Vehicle Safety, Product Legal or Compliance, Product Environmental concern that results in significant customer dissatisfaction.

All decisions regarding potentially critical concerns are handled by the Critical Concern Management Team (CCMT) to secure that all decisions are taken with senior management from all departments within the company. This is necessary since each potential critical concern is unique.

The CCMT Meeting is scheduled weekly or within 24 hours' notice. The invited participants are requested to attend within 24 hours' notice, 7 days a week.

Each potential critical product concern addressed in CCMT results in a Lesson Learned at Corporate level. The purpose of this process is to secure that we do not repeat any similar issues in the future.

## **3. Reporting of emission related component failures**

After approval at CCMT the report is sent to NSC for further distribution to the concerned authority. If a deviation exist and a Field Service Action is required it will be approved in the same process.

# 7.1 MFR CONDUCTED COASTDOWN SELF-AUDIT PROGRAM

---



- Separate presentation was submitted to EPA Jan 27, 2020.

EPA Comments?

- In short: Coastdown data is based on physical coastdown on road (Arizona Proving Ground, APG) [Ref. Cert Application S12.04.02].
- The verification of vehicles is performed in Sweden in the Volvo Wind Tunnel (for better repeatability, independent of Swedish weather)

# 8.1 MFR TESTING USING PEMS



*(Same info as presented at the 2020MY Pre-Cert presentation)*

- Volvo is currently only using PEMS for testing on EU-specification vehicles as a part of development and certification of EU specified cars.
- The result from the EU cars is a good indicator of the behaviour of any US specified car because the emission control strategies for EU and US developed Volvo car are the same, but of course the Exhaust After-Treatment System between EU and US cars differ where EU cars have a GPF (Gasoline Particle Filter) and US cars normally have catalytic converters with higher PGM load.

# **Ex. 4 CBI**

# 9.1 OTHER ISSUES EPA PAGE#2

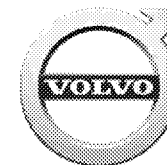


- Volvo would like to equip certification vehicles with data logger "WICE" (Wireless Communication and Data Acquisition).
  - Can only read signals, not upload, write or control vehicle (with current HW setup)
  - Reads signals on OBD connector
  - Built in memory
  - Built in SIM 3G/4G card (cannot send data in laboratory if there is not 3G/4G signal)
- Purpose is to monitor and understand vehicle behaviour during certification and confirmatory testing
- EPA comments?



## 9.2 OTHER ISSUES CARB

---



- BEV's are Certified to EPA Tier3 Bin0, but for Calif, there is no specific Exhaust standard below SULEV20, they are certified as ZEV and counted as LEVIII vehicles included in the fleet average calculations with emission level Zero.
  - CARB: Will this change in the future? (for example the future PM 1mg phase-in)

# REVISION LOG



---

## DATE / PAGE

## Action / By

Feb 03 2020 / 23

Corrected 2015MY credit balance / ME

Feb 04 2020

Simplified information. Content not changed / PAL

Feb 06 2020 / 7

Added info about memory for pure mode in 2022MY / PAL

Feb 06 2020 / 4,5,32

Added info about production start for BEV / PAL

Feb 06 2020 / 44

Added Q about credit expiration date / PAL

Feb 07 2020 / 29

Added info about corrected ZEV credits 220MY / PAL

Message

---

**From:** Wright, DavidA [Wright.DavidA@epa.gov]  
**Sent:** 10/24/2018 10:24:59 PM  
**To:** Anderson, Tom [Anderson.Tom@epa.gov]; Ball, Joel [ball.joel@epa.gov]; Cullen, Daniel [Cullen.Daniel@epa.gov]; Dalton, Joel [Dalton.Joel@epa.gov]; Good, David [good.david@epa.gov]; Kochunas, Kathryn [kochunas.kathryn@epa.gov]; Ott, William [ott.william@epa.gov]; Rojeck, Tristin [rojeck.tristin@epa.gov]; Snyder, Jim [Snyder.Jim@epa.gov]; Wehrly, Linc [wehrly.linc@epa.gov]  
**Subject:** Some more slight revisions to the Cert Engineer Responsibilities List  
**Attachments:** EPA LDV Cert Engineer Resp 10 24 18.xlsx

Attached is the latest update to the cert engineer responsibilities list. I have replaced the two Chrysler and Fiat lines with the single FCA Group Automobiles SpA per Joel D.'s request. I have added Subaru Technica International (STI) to the small volume list and Kathryn has been assigned STI with Tom A. as the backup. Lastly Kathryn and I swapped Saleen and McLaren.

At this point I think we have all of the changes complete. Let me know if there are any other typos or changes that you think are needed. I suggest we call the manufacturers that are getting changes to their Primary Certification engineer by the CoB this week and then we can get the final list and guidance letter to Holly for publication early next week.

Thanks,

David

Group	Manufacturer	Certification Engineer	
		Primary	Backup
	Mazda Motor Corporation	Will Ott	Kathryn Kochunas
	Aston Martin Lagonda	Will Ott	Tom Anderson
	Toyota	Will Ott	Dan Cullen
	Volvo Cars of North America LLC	Will Ott	Joel Dalton
	Mitsubishi	Will Ott	Jim Snyder
	BYD	Will Ott	David Wright
	Cummins Inc	Kathryn Kochunas	Joel Dalton
	Nissan Technical Center North America, Inc	Kathryn Kochunas	Jim Snyder
	Subaru	Kathryn Kochunas	David Wright
<b>JLR Group</b>	American Honda	Joel Dalton	Jim Snyder
	FCA Group Automobiles SpA	Joel Dalton	Joel Ball
	Maserati North America, Inc	Joel Dalton	Tristin Rojeck
	Jaguar Cars Limited	Joel Dalton	Jim Snyder
	Land Rover	Joel Dalton	Jim Snyder
	General Motors	Dan Cullen	Tristin Rojeck
	Daimler	Dan Cullen	Will Ott
<b>HATCI</b>	Kia Motors Corporation	Dan Cullen	Kathryn Kochunas
	Hyundai Motor Company	Dan Cullen	Kathryn Kochunas
	Porsche	Jim Snyder	Joel Dalton
	PSA	Jim Snyder	Will Ott
<b>VW Group</b>	Volkswagen	Jim Snyder	David Wright
	Audi	Jim Snyder	David Wright
	Automobili Lamborghini SpA	Jim Snyder	David Wright
	Bentley Motors	Jim Snyder	David Wright
	Bugatti Automobiles SAS	Jim Snyder	David Wright
<b>BMW Group</b>	Ford LDV/LDT/2B&3	Tristin Rojeck	Dan Cullen
	BMW	Tristin Rojeck	Will Ott
	Rolls-Royce	Tristin Rojeck	Will Ott
	Tesla Motors Inc	Tristin Rojeck	Will Ott
<b>Small Volume</b>	Equus	Dan Cullen	Tom Anderson
	Ferrari North America, Inc	Joel Dalton	Tom Anderson
	Karma Automotive LLC	Will Ott	Tom Anderson
	Koenigsegg Automotive AB	Tristin Rojeck	Tom Anderson
	Lotus Cars Ltd	Jim Snyder	Tom Anderson
	McLaren	Kathryn Kochunas	Tom Anderson
	Morgan	Jim Snyder	Tom Anderson
	Pagani	Dan Cullen	Tom Anderson
	Rimac	David Wright	Tom Anderson
	RUF Automobile GmbH	Jim Snyder	Tom Anderson
	Roush Industries	Jim Snyder	Tom Anderson
	STI	Kathryn Kochunas	Tom Anderson
	Saleen	David Wright	Tom Anderson

#### Ex. 4 CBI

Geely

Message

---

**From:** Anderson, Tom [Anderson.Tom@epa.gov]  
**Sent:** 10/4/2018 9:11:29 PM  
**To:** Snyder, Jim [Snyder.Jim@epa.gov]  
**CC:** Wright, DavidA [Wright.DavidA@epa.gov]; Dalton, Joel [Dalton.Joel@epa.gov]; Rojeck, Tristin [rojeck.tristin@epa.gov]  
**Subject:** GAC

Jim,

You are correct Geely is not a subsidiary of GAC – see below:

**GAC Group** (officially **Guangzhou Automobile Group Co., Ltd.**<sup>[3]</sup>) is a Chinese automobile maker headquartered in Guangzhou, Guangdong, and a subsidiary of Guangzhou Automobile Industry Group

GAC sells passenger cars under the Trumpchi brand, passenger cars and commercial vehicles under the Gonow brand, SUVs under the Changfeng Motor brand, and buses under the GAC Bus brand. GAC produced 728,000 vehicles in 2012, and is the tenth largest in volume. It is the sixth-largest producer of passenger cars among Chinese automakers.<sup>[4]</sup> While the company is primarily focused on consumer vehicles, it does make large passenger buses and commercial trucks<sup>[5]</sup> although it is outside the top ten commercial vehicle makers in China.<sup>[4]</sup>

GAC is currently known for its Honda-branded auto producing joint venture with this Japanese automaker, but the company has a total of five foreign partners—more than most Chinese automakers. These partnerships allow it to produce foreign-branded products for sale in China. These brands include: Fiat, Honda, Isuzu, Mitsubishi, and Toyota. Other brand names associated with GAC are Everus, for consumer vehicles, and Hino.

Message

---

**From:** Wright, DavidA [Wright.DavidA@epa.gov]  
**Sent:** 10/4/2018 6:48:57 PM  
**To:** Snyder, Jim [Snyder.Jim@epa.gov]; Cullen, Daniel [Cullen.Daniel@epa.gov]; Dalton, Joel [Dalton.Joel@epa.gov]; Ott, William [ott.william@epa.gov]  
**CC:** Wehrly, Linc [wehrly.linc@epa.gov]  
**Subject:** RE: **Ex. 4 CBI**

Okay – thanks for the clarification.

Regards,

David

---

**From:** Snyder, Jim  
**Sent:** Thursday, October 04, 2018 2:38 PM  
**To:** Wright, DavidA <Wright.DavidA@epa.gov>; Cullen, Daniel <Cullen.Daniel@epa.gov>; Dalton, Joel <Dalton.Joel@epa.gov>; Ott, William <ott.william@epa.gov>  
**Cc:** Wehrly, Linc <wehrly.linc@epa.gov>  
**Subject:** RE: **Ex. 4 CBI**

Just to Clarify another confused point, **Ex. 4 CBI**, not **Geely**, owner of Lotus, Volvo, and Terrafugia

From Wikipedia

**Ex. 4 CBI**

**Geely** (officially **Zhejiang Geely Holding Group Co., Ltd**) is a Chinese multinational automotive manufacturing company headquartered in Hangzhou, Zhejiang. It sells passenger vehicles under the Geely Auto, Lotus, Lynk & Co, PROTON, and Volvo brands and commercial vehicles under the London EV Company and Yuan Cheng Auto brands. In 2011, 15,596,100 units (7,793,600 passenger vehicles) were sold in China, giving Geely a 2.66% market share

---

**From:** Wright, DavidA  
**Sent:** Thursday, October 04, 2018 11:15 AM  
**To:** Cullen, Daniel <Cullen.Daniel@epa.gov>; Dalton, Joel <Dalton.Joel@epa.gov>; Ott, William <ott.william@epa.gov>; Snyder, Jim <Snyder.Jim@epa.gov>  
**Cc:** Wehrly, Linc <wehrly.linc@epa.gov>  
**Subject:** FW: **Ex. 4 CBI**

As ya'll are pinging me individually (except for possibly Will O.) that I have stomped on the Aston Martin meeting, I thought I would share with you the e-mail exchange between Linc and Ken Boshart who is coordinating **Ex. 4 CBI**

**Ex. 4 CBI**

The date was set with [Ex. 4 CBI] earlier this week after they traded a few e-mails with Linc. I added the meeting schedule to the calendar once I saw that Will (unknown to him at the time) had scheduled the Aston Martin CPM at the same time as the previously agreed upon [Ex. 4 CBI]. My apologies to Will for not having had the [Ex. 4 CBI] meeting on the calendar prior to his scheduling of Aston Martin.

Regards,

David

---

**From:** Kenneth Boshart [mailto:Ken@boshartats.com]  
**Sent:** Tuesday, October 02, 2018 2:54 PM  
**To:** Wehrly, Linc <wehrly.linc@epa.gov>  
**Cc:** Wright, DavidA <Wright.DavidA@epa.gov>  
**Subject:** Re: [Ex. 4 CBI]

Linc,

Great! Thank you.

Ken

---

**From:** Wehrly, Linc <wehrly.linc@epa.gov>  
**Sent:** Tuesday, October 2, 2018 11:44 AM  
**To:** Kenneth Boshart  
**Cc:** Wright, DavidA  
**Subject:** RE: [Ex. 4 CBI]

Ken,

[Ex. 4 CBI] will be fine. We look forwards to seeing the list of attendees.

Thanks,  
Linc

---

**From:** Kenneth Boshart [mailto:Ken@boshartats.com]  
**Sent:** Tuesday, October 02, 2018 2:42 PM  
**To:** Wehrly, Linc <wehrly.linc@epa.gov>  
**Cc:** Wright, DavidA <Wright.DavidA@epa.gov>  
**Subject:** [Ex. 4 CBI]

Dear Linc,

**Ex. 4 CBI**

Is this date and time available?

When I have the list of attendees, I will provide that.

Finally, in terms of the agenda, do you have specific items which you would like to be sure that we cover in this meeting? This will be the first EPA **Ex. 4 CBI** meeting that I have attended in a number of years. The last ones were with **Ex. 4 CBI**

Sincerely,

Ken Boshart

Message

---

**Sent:** 2/13/2020 1:42:16 PM  
**To:** Wehrly, Linc [wehrly.linc@epa.gov]; Wright, DavidA [Wright.DavidA@epa.gov]; Ball, Joel [ball.joel@epa.gov]; Cullen, Daniel [cullen.daniel@epa.gov]; Snyder, Jim [snyder.jim@epa.gov]; Dalton, Joel [Dalton.Joel@epa.gov]; Rojeck, Tristin [rojeck.tristin@epa.gov]; Kochunas, Kathryn [kochunas.kathryn@epa.gov]; Fernandez, Antonio [fernandez.antonio@epa.gov]; Good, David [good.david@epa.gov]  
**Subject:** Volvo CPM Meeting Materials  
**Attachments:** CBI\_MVVX\_CORRESP\_LTR01CPP.pdf; Volvo Conducted Coast Down Self Audit Program.pdf

Attached are the materials for today's meeting with Volvo.

Message

---

**From:** Doku, Dan [dan.doku@volvocars.com]  
**Sent:** 2/7/2020 1:54:31 PM  
**To:** Ott, William [ott.william@epa.gov]; McDuffee, Bill@ARB [Bill.McDuffee@arb.ca.gov]  
**CC:** Andersson, Christian (L) [christian.l.andersson@volvocars.com]; Lennvi, Per-Anders (P-A L) [per-anders.lennvi@volvocars.com]; Rana, Nitin [nitin.rana@volvocars.com]; Guidi, Jason (R&C) [jason.guidi@volvocars.com]; Doku, Dan [dan.doku@volvocars.com]  
**Subject:** RE: Volvo Pre-Cert 2021 Document  
**Attachments:** CBI\_MVVX\_CORRESP\_LTR01CPP.pdf

February 7, 2021

Dear Will and Bill,

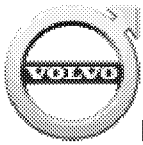
Please note that I have uploaded a revised 2021 Pre-Cert document into both EV-CIS and DMS for our respective pre-certification meetings next week. I have also attached the document here to this email as reference.

Also, I have placed our pre-certification meeting dates and time below:

- CARB, the morning of Tuesday 9am to 11am, February 11, 2019.
- EPA, the morning of Thursday 10am-12noon, February 13, 2019.

Thank you and best regards.

Dan



Dan Doku  
Certification, Regulatory & Compliance  
[Dan.doku@volvocars.com](mailto:Dan.doku@volvocars.com)

VOLVO CAR USA LLC  
Quality & Customer Satisfaction  
270 Three Point Drive  
Ridgeville, SC 29472  
USA  
[Volvocars.com](http://Volvocars.com)

---

**From:** Doku, Dan  
**Sent:** Friday, January 31, 2020 10:01 AM  
**To:** Ott, William <ott.william@epa.gov>; McDuffee, Bill@ARB <Bill.McDuffee@arb.ca.gov>; Yu, Yong@ARB <yong.yu@arb.ca.gov>  
**Cc:** Andersson, Christian (L) <christian.l.andersson@volvocars.com>; Lennvi, Per-Anders (P-A L) <per-anders.lennvi@volvocars.com>; Doku, Dan <dan.doku@volvocars.com>; Rana, Nitin <nitin.rana@volvocars.com>  
**Subject:** Volvo Pre-Cert 2021 Document

January 31, 2020

Dear Will and Bill,

Please note that I have attached our 2021 model year pre-certification document to this email. Additionally, the document has been uploaded to EPA's EV-CIS site as well.

Bill and Yong, also please note that the actual folder under Category Common Information within DMS has not yet been created for MY2021. I did try to create the folder however I received a not authorized message back from DMS. Best regards and have a great weekend.

Dan



Dan Doku  
Senior Manager, Certification & Conformity  
Certification, Regulatory & Compliance  
[Dan.doku@volvocars.com](mailto:Dan.doku@volvocars.com)

VOLVO CAR USA LLC  
Quality & Customer Satisfaction  
270 Three Point Drive  
Ridgeville, SC 29472  
USA  
[Volvocars.com](http://Volvocars.com)

Message

---

**From:** Snyder, Jim [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=18260D02987D49E280FC03D2A8D18DDD-SNYDER, JIM]  
**Sent:** 9/19/2019 2:43:57 PM  
**To:** Wright, DavidA [Wright.DavidA@epa.gov]; Wright, DavidA [Wright.DavidA@epa.gov]  
**Subject:** FW: Did NHTSA Approve the safety requirements, etc for Kandi K22 Electric Car?

Here's what we found out from D Good's NHTSA contact re: Kandi safety approval. It appears it's self-cert?

---

**From:** Thurgood, Neil (NHTSA) [mailto:neil.thurgood.CTR@dot.gov]  
**Sent:** Tuesday, August 06, 2019 4:17 PM  
**To:** Good, David <good.david@epa.gov>  
**Cc:** Snyder, Jim <Snyder.Jim@epa.gov>; Wright, DavidA <Wright.DavidA@epa.gov>; Chodrow, Brian (NHTSA) <Brian.Chodrow@dot.gov>  
**Subject:** RE: Did NHTSA Approve the safety requirements, etc for Kandi K22 Electric Car?

Hi David,

Please accept my apologies for the delay in responding to your email.

Coleman's former duties are currently being handled by Brian Chodrow (copied on this email) in his capacity as the acting chief of the Import and Certification Division. I can, however, address the question you have posed.

NHTSA does not offer type approval of any motor vehicle or regulated motor vehicle equipment. Instead, manufacturers are required to provide certain procedural documentation to identify themselves as manufacturers, and may certify their own vehicles or equipment items to the applicable Federal motor vehicle safety standards. It does appear that Kandi, as "ZHEJIANG KANGDI VEHICLES CO. LTD," has registered the U.S. World Manufacturer Identifier 7KZ, and has provided identifying information. I cannot confirm whether they are currently certifying vehicles.

I hope this information is helpful. Please let me know if you have any further questions.

Neil Thurgood  
Safety Compliance Analyst  
Import and Certification Division  
Office of Vehicle Safety Compliance

---

**From:** Good, David [mailto:good.david@epa.gov]  
**Sent:** Thursday, August 01, 2019 5:56 PM  
**To:** Thurgood, Neil (NHTSA) <neil.thurgood.CTR@dot.gov>  
**Cc:** Snyder, Jim <Snyder.Jim@epa.gov>; Wright, DavidA <Wright.DavidA@epa.gov>; clindsay@nhtsa.dot.gov  
**Subject:** FW: Did NHTSA Approve the safety requirements, etc for Kandi K22 Electric Car?

Neil,

It's my understanding that you are handling the NHTSA safety issues formerly handled by Coleman Sachs (before he retired).

I work in the EPA Compliance Division for Linc Wehrly. We certify light-duty passenger cars, light trucks and heavy-duty class 2b/3 vehicles for compliance with EPA emission standards, handle fuel economy labeling (window sticker) requirements, CAFE, and greenhouse gas issues, among other things.

We have been working with Bill Rucker, of Ecologic Labs in California, regarding the EPA certification and fuel economy requirements of Kandi vehicles. See the contact information and the news article below.

We would like to confirm whether NHTSA has indeed approved the safety requirements for the K22 Kandi model (an electric vehicle manufactured in China) as indicated in the news article below.

Please advise, when you get a chance.

Thanks

Dave Good, Engineer  
U.S. EPA  
734-214-4450

---

**From:** Snyder, Jim <[Snyder.Jim@epa.gov](mailto:Snyder.Jim@epa.gov)>  
**Sent:** Thursday, August 1, 2019 5:08 PM  
**To:** Good, David <[good.david@epa.gov](mailto:good.david@epa.gov)>  
**Cc:** Wright, DavidA <[Wright.DavidA@epa.gov](mailto:Wright.DavidA@epa.gov)>  
**Subject:** US NHTSA Approves 2 Kandi Electric Cars?

Dave,  
Here is the News Article :  
<https://cleantechnica.com/2019/02/22/us-approves-chinese-electric-cars-imported-from-kandi/>

and below is the guy contacting us from Ecologic labs. The car company is registered in our system as **Zhejiang Kangdi Vehicles Co. LTD (ZJK)** but it's a joint venture with **Geely** and vehicle brand name is **Kandi** . I'd just like to confirm that the K22 has NHTSA approval.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** William Rucker <[tetemissions@aol.com](mailto:tetemissions@aol.com)>  
**Sent:** Wednesday, July 31, 2019 4:02 PM  
**To:** Wright, DavidA <[Wright.DavidA@epa.gov](mailto:Wright.DavidA@epa.gov)>  
**Subject:** Kandi K22 certification app requirements

Good Evening David,

David I have made it thru most of the reporting requirements for the Kandi K22 electric car. We have a launch date on Oct. 1 2019 of the 2020 year model.

Message

---

**From:** Anderson, Tom [Anderson.Tom@epa.gov]  
**Sent:** 9/7/2017 8:54:01 PM  
**To:** Hurlin, David [hurlin.david@epa.gov]  
**CC:** Wright, DavidA [Wright.DavidA@epa.gov]; Wehrly, Linc [wehrly.linc@epa.gov]  
**Subject:** FW: [WARNING: SPF validation failed] RE: Importing China New Energy Vehicle for Car Share Demonstration Project  
**Attachments:** China\_StationCars.pdf

David,

## Ex. 5 Deliberative Process (DP)

If the Chinese company wants to certify and import EV's into the U.S. then, have a company representative contact me.

Thanks.

Tom

---

**From:** Imports  
**Sent:** Monday, August 28, 2017 1:33 PM  
**To:** Anderson, Tom <Anderson.Tom@epa.gov>  
**Cc:** editor@evworld.com  
**Subject:** FW: [WARNING: SPF validation failed] RE: Importing China New Energy Vehicle for Car Share Demonstration Project

Tom,  
Can you send this person the information on certifying electric motor vehicles?

David C. Hurlin  
EPA Imports Line, Exemptions  
Managed by Jacobs, Contractor to the U.S. EPA  
Phone: (734) 214-4098 or 4100  
Fax: (734) 214-4676

---

**From:** Bill Moore [mailto:editor@evworld.com]  
**Sent:** Monday, August 28, 2017 12:23 PM  
**To:** Imports <Imports@epa.gov>  
**Subject:** [WARNING: SPF validation failed] RE: Importing China New Energy Vehicle for Car Share Demonstration Project

David.... here you go. Hope this is a good starting point for your evaluation. Let me know what else you may need. The first two cars (Zotye and Zhidou) are already in production. The Baojun is a newly unveiled concept JV with SIAC and General Motors.

Bill

On Aug 28, 2017, at 9:45 AM, Imports wrote:

Bill Moore,  
Send it to the imports email address.

David C. Hurlin  
EPA Imports Line, Exemptions  
Managed by Jacobs, Contractor to the U.S. EPA  
Phone: (734) 214-4098 or 4100  
Fax: (734) 214-4676

\*\*\*\*\*

Bill Moore, Publisher  
EV WORLD.COM  
<http://evworld.com>  
Papillion, NE 68046  
United States of America  
402.339.9877 ofc  
402.575.8085 mobile  
SKYPE:evworldhome

\*\*\*\*\*



## Zotye Zhima E30

The E30 is an all-electric two-seater unveiled by Zotye Auto in April 2015 at the Shanghai Auto Show. It is manufactured in Hangzhou, Zhejiang. The Smart-lookalike sits on a 1765mm wheelbase, and is 2798mm long, 1563mm wide, and 1572mm tall. It sports a central console inspired by Tesla Model S, with a large touch screen.

The e-drive system features a 17.6KWH battery pack and an electric motor that can deliver up to 18KW of power and 83NM of torque. According to Zotye, the E30 has a top speed exceeding 80km/h and a driving range of 150km.





## Zhidou D2 EV

Geely & Xin Da Yang launched the ZD D2 in June 2015. The Geely Zhi Dou D2 EV is the first model from the joint venture established earlier in 2015 between Geely Holding Group and Xindayang. The JV company is called Zhi Dou Electric Vehicle Corporation, and the brand is also known as Ninghai Know Beans. The D2 is designed specifically as a city vehicle but Highway Capable, therefore not just a Neighbourhood Electric Vehicle. The JV company also produces a variant of the vehicle as the Zotye E20. The ZD D2 is fully connected to make it IoT-ready and includes a full complete Advanced Driver Assistance System (ADAS) that includes a camera, anti-collision warning, and lane departure warning.





## SAIC GM Baojun E100

The E100 finds power from one motor, which puts out 110 N·m (74 lb-ft) of torque and 29 kW of power. It's the ideal city car for China, with a range of up to 155 km (96 miles) on a single charge. Additionally, it has the capability to travel on the expressway, with its top speed of 100 km/h (62 mph). The E100 can be fully charged in 7.5 hours, and uses regenerative braking to add range while driving. The stylish and tiny urban EV measures 1,600 mm at its wheelbase, with a height of 1,670 mm. It seats two adults comfortably and has an impressive turning radius of 3.7 meters, meaning it can easily maneuver in and out of China's cramped parking spaces and congested alleys. The E100 comes with a handful of basic safety features, including a pedestrian alert system, parking sensors, and child safety seat locks. It also includes standard anti-lock brakes, electric power steering, and an electronic parking brake. Suspension is independent up front, with single-arm in the rear.



Message

---

**From:** French, Roberts [french.roberts@epa.gov]  
**Sent:** 11/12/2019 8:55:40 PM  
**To:** Wehrly, Linc [wehrly.linc@epa.gov]; Olechiw, Michael [olechiw.michael@epa.gov]; Lieske, Christopher [lieske.christopher@epa.gov]; Moran, Robin [moran.robin@epa.gov]  
**CC:** Zaremski, Sara [zaremski.sara@epa.gov]  
**Subject:** FW: Jaguar's Owner Approaches Geely, BMW in Hunt for Partners

Don't know if you saw this:

<https://www.bloomberg.com/news/articles/2019-11-12/jaguar-owner-is-said-to-approach-geely-bmw-in-hunt-for-partners>

Roberts W. French, Jr.  
U.S. Environmental Protection Agency  
National Vehicle and Fuel Emissions Laboratory  
2000 Traverwood Drive  
Ann Arbor, Michigan 48105  
(734) 214-4380

Appointment

---

**From:** Wright, DavidA [Wright.DavidA@epa.gov]  
**Sent:** 10/3/2018 7:05:46 PM  
**To:** Ott, William [ott.william@epa.gov]; Wehrly, Linc [wehrly.linc@epa.gov]  
**Subject:** Tentative: Aston Martin Cert Preview Meeting  
**Location:** AA-Room-Lab-601D-ConfRoom/AA-OTAQ-LAB  
**Start:** 11/8/2018 3:00:00 PM  
**End:** 11/8/2018 4:30:00 PM  
**Show Time As:** Busy

Linc,

I think Will's proposed Aston Martin Certification Preview conflicts with the date and time you provided to Geely Ex. 4 CBI  
Ex. 4 CBI Not sure how best to resolve.

Regards,

David

Message

---

**From:** Wehrly, Linc [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=64E5F31CCB4841018441B3BF074842D0-WEHRLY, LINC]  
**Sent:** 10/4/2018 1:05:35 PM  
**To:** Wright, DavidA [Wright.DavidA@epa.gov]  
**Subject:** Re: VW and Aston Martin cert preview meetings

Yes, please.

Sent from my iPhone

On Oct 3, 2018, at 6:30 PM, Wright, DavidA <Wright.DavidA@epa.gov> wrote:

Linc – would you like me to schedule a conference room for that date and time for Geely, so, we get that on our calendar's now.

Regards,

David

---

**From:** Wehrly, Linc  
**Sent:** Wednesday, October 03, 2018 3:41 PM  
**To:** Snyder, Jim <Snyder.Jim@epa.gov>; Ott, William <ott.william@epa.gov>  
**Cc:** Wright, DavidA <Wright.DavidA@epa.gov>  
**Subject:** VW and Aston Martin cert preview meetings

Jim and Will,

I wasn't paying attention and may have made a big mistake. Geely has reached out to me several times to schedule { Ex. 4 CBI } they want to bring 12 engineers from China. The date and time I finally agreed to was November 8<sup>th</sup> at 10 am. David pointed out to me that I accepted appointments from both of you for cert preview meetings on the same date and possibly same time. If it would at all be possible, I would like to reschedule the VW and Aston meetings to either another date or at a different time than the Geely meeting. Let me know how much of a problem this would be.

Thanks,  
Linc

Message

---

**From:** Wright, DavidA [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4F14A47C701547479B12BEE35117D0A9-WRIGHT, DAVID A.]  
**Sent:** 2/24/2020 4:24:30 PM  
**To:** Davis, Theresa [Davis.Theresa@epa.gov]  
**Subject:** RE: EPA Deliberative List  
**Attachments:** Internal EPA Use Only LDV Cert Engineer Resp 3 Dec 2019.xlsx

I apologize for the small print size – here is the document.

Regards,

David

---

**From:** Davis, Theresa <Davis.Theresa@epa.gov>  
**Sent:** Monday, February 24, 2020 11:22 AM  
**To:** Wright, DavidA <Wright.DavidA@epa.gov>  
**Subject:** EPA Deliberative List

Could you please resend the above list to me? It's gone from my email and I want to increase the size as it printed very small.

Thanks

*Theresa Davis  
Technical Support Specialist  
USEPA Compliance Division, OTAQ  
Serving EPA through SSAI  
(734) 214-4540 phone (734) 214-4053 fax  
[Davis.theresa@epa.gov](mailto:Davis.theresa@epa.gov)*



**LOVE** the life you live, **LIVE** the life you love. Bob Marley

Message

---

**From:** Wright, DavidA [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4F14A47C701547479B12BEE35117D0A9-WRIGHT, DAVID A.]  
**Sent:** 12/3/2019 1:40:47 PM  
**To:** Snyder, Jim [Snyder.Jim@epa.gov]  
**CC:** Tom Anderson (Anderson.Tom@epa.gov) [Anderson.Tom@epa.gov]; Ball, Joel [ball.joel@epa.gov]; Cullen, Daniel [cullen.daniel@epa.gov]; Dalton, Joel [Dalton.Joel@epa.gov]; Kimball, Joshua [kimball.joshua@epa.gov]; Kochunas, Kathryn [kochunas.kathryn@epa.gov]; Ott, William [ott.william@epa.gov]; Rojeck, Tristin [rojeck.tristin@epa.gov]; Snyder, Jim [Snyder.Jim@epa.gov]; Wehrly, Linc [wehrly.linc@epa.gov]  
**Subject:** Latest updated certification responsibilities spreadsheet - Jim asked for a copy, includes newer manufacturers  
**Attachments:** Internal EPA Use Only LDV Cert Engineer Resp 3 Dec 2019.xlsx

Let me know if you have any questions, or, if you identify any mistakes with your assigned manufacturers.

Thanks,

David

Message

---

**From:** Wright, DavidA [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4F14A47C701547479B12BEE35117D0A9-WRIGHT, DAVID A.]  
**Sent:** 11/14/2018 8:29:14 PM  
**To:** Tom Anderson (Anderson.Tom@epa.gov) [Anderson.Tom@epa.gov]; Ball, Joel [ball.joel@epa.gov]; Cullen, Daniel [cullen.daniel@epa.gov]; Dalton, Joel [Dalton.Joel@epa.gov]; Good, David [good.david@epa.gov]; Kochunas, Kathryn [kochunas.kathryn@epa.gov]; Ott, William [ott.william@epa.gov]; Pugliese, Holly [pugliese.holly@epa.gov]; Rojeck, Tristin [rojeck.tristin@epa.gov]; Snyder, Jim [Snyder.Jim@epa.gov]; Wehrly, Linc [wehrly.linc@epa.gov]  
**Subject:** INTERNAL USE ONLY EPA LDVC Manufacturer Contacts  
**Attachments:** Internal EPA Use Only LDV Cert Engineer Resp 14 Nov 18.xlsx

Attached is the latest updated list of manufacturer contacts primary and backup. This list contains assignments for manufacturers that have not applied for certification in a number of years, and, it also includes manufacturers that have expressed interest in getting certifications for the first time. Do not share this list outside the Agency as not all of the manufacturers may want to be identified as having contacted EPA.

Also, per there request **Ex. 4 CBI** has been added to the list and Jim S. is their primary contact.

Thanks,

David

Message

---

**From:** Wright, DavidA [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4F14A47C701547479B12BEE35117D0A9-WRIGHT, DAVID A.]  
**Sent:** 10/24/2018 10:24:59 PM  
**To:** Tom Anderson (Anderson.Tom@epa.gov) [Anderson.Tom@epa.gov]; Ball, Joel [ball.joel@epa.gov]; Cullen, Daniel [cullen.daniel@epa.gov]; Dalton, Joel [Dalton.Joel@epa.gov]; Good, David [good.david@epa.gov]; Kochunas, Kathryn [kochunas.kathryn@epa.gov]; Ott, William [ott.william@epa.gov]; Rojeck, Tristin [rojeck.tristin@epa.gov]; Snyder, Jim [Snyder.Jim@epa.gov]; Wehrly, Linc [wehrly.linc@epa.gov]  
**Subject:** Some more slight revisions to the Cert Engineer Responsibilities List  
**Attachments:** EPA LDV Cert Engineer Resp 10 24 18.xlsx

Attached is the latest update to the cert engineer responsibilities list. I have replaced the two Chrysler and Fiat lines with the single FCA Group Automobiles SpA per Joel D.'s request. I have added Subaru Technica International (STI) to the small volume list and Kathryn has been assigned STI with Tom A. as the backup. Lastly Kathryn and I swapped Saleen and McLaren.

At this point I think we have all of the changes complete. Let me know if there are any other typos or changes that you think are needed. I suggest we call the manufacturers that are getting changes to their Primary Certification engineer by the CoB this week and then we can get the final list and guidance letter to Holly for publication early next week.

Thanks,

David